

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

GENOVA BURNS LLC

Daniel M. Stolz, Esq.
Donald W. Clarke, Esq.
Matthew I.W. Baker, Esq.
dstolz@genovaburns.com
dclarke@genovaburns.com
mbaker@genovaburns.com
110 Allen Road, Suite 304
Basking Ridge, NJ 07920
Tel: (973) 467-2700
Fax: (973) 467-8126
*Local Counsel to the Official Committee of
Talc Claimants*

BROWN RUDNICK LLP

David J. Molton, Esq.
Robert J. Stark, Esq.
Michael S. Winograd, Esq.
Eric R. Goodman, Esq.
dmolton@brownrudnick.com
rstark@brownrudnick.com
mwinograd@brownrudnick.com
egoodman@brownrudnick.com
Seven Times Square
New York, NY 10036
Tel: (212) 209-4800
Fax: (212) 209-4801
and
Jeffrey L. Jonas, Esq.
Sunni P. Beville, Esq.
jjonas@brownrudnick.com
sbeville@brownrudnick.com
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
Fax: (617) 856-8201
*Co-Counsel for the Official Committee of
Talc Claimants*

MASSEY & GAIL LLP

Jonathan S. Massey, Esq.
Bret Vallacher, Esq.
jmassey@masseygail.com
bvallacher@masseygail.com
1000 Maine Ave. SW, Suite 450
Washington, DC 20024
Tel: (202) 652-4511
Fax: (312) 379-0467
*Special Counsel for the Official Committee of
Talc Claimants*

OTTERBOURG P.C.

Melanie L. Cyganowski, Esq.
Richard G. Haddad, Esq.
Adam C. Silverstein, Esq.
Jennifer S. Feeney, Esq.
David A. Castleman, Esq.
mcyganowski@otterbourg.com
rhaddad@otterbourg.com
asilverstein@otterbourg.com
jfeeney@otterbourg.com
dcastleman@otterbourg.com
230 Park Avenue
New York, NY 10169
Tel: (212) 661-9100
Fax: (212) 682-6104
*Co-Counsel for Official Committee of Talc
Claimants*

In Re:

LTL MANAGEMENT, LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Official Committee of Talc Claimants (the “**TCC**” or the “**Committee**”) in the above-captioned case of LTL Management, LLC (the “**Debtor**” or “**LTL**”), by and through the Committee’s counsel, having filed substantially contemporaneously with this Application (i) *The Official Committee of Talc Claimants’ Proposed Findings of Facts and Conclusions of Law in Support of Their Motion to Dismiss the Second Bankruptcy Petition of LTL Management LLC* (the “**TCC’s Proposed FoFs/CoLs**”), and (ii) the *Motion to Seal the Redacted Portions of The Official Committee of Talc Claimants’ Proposed Findings of Facts and Conclusions of Law in Support of Their Motion to Dismiss the Second Bankruptcy Petition of LTL Management LLC* (the “**Motion to Seal**”²), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² A redacted version of the TCC’s Proposed FoFs/CoLs has been filed immediately prior to the filing of the Motion to Seal. An unredacted version of the TCC’s Proposed FoFs/CoLs is being filed immediately after the filing of the Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](#)).

1. **For the reasons set forth below, the Committee respectfully requests that the hearing on the Motion to Seal be scheduled for July 27, 2023, at 10:00 a.m., or as soon thereafter as the Court’s calendar permits.**

2. The Motion to Seal sets forth relevant preliminary and background matters which are incorporated herein by reference.

3. On April 24, 2023, the Committee filed a motion to dismiss the Debtor’s second bankruptcy filing for cause [Docket No. 286] (the “TCC Motion to Dismiss”). Ten additional parties, including the Office of the United States Trustee [Docket No. 379] and Ad Hoc Committee of States [Docket No. 352], have also filed motions to dismiss this Chapter 11 case for cause (collectively, with the TCC Motion to Dismiss, the “Motions to Dismiss”).³

4. A trial on the Motions to Dismiss was held from June 27 thru June 30, 2023.

5. The TCC’s Proposed FoFs/CoLs are submitted pursuant to the direction of the Court to the parties at the conclusion of the trial on the Motions to Dismiss. The Court also stated that a decision with respect to the Motions to Dismiss should be ready by August 2, 2023.

6. Accordingly, the Committee respectfully requests that the hearing on the Motion to Seal be scheduled before the Court renders its decision with respect to the Motions to Dismiss in case any of the redacted portions of the TCC’s Proposed FoFs/CoLs may be incorporated into the Court’s decision.

7. By this Application, the Committee respectfully requests that the hearing on the Motion to Seal be scheduled on June 27, 2023, at 9:00 a.m., or as soon thereafter as the Court’s calendar permits.

³ Additional filings in support of dismissal include Docket Nos. 335, 346, 352, 358, 384, 473, 480, and Adv. Pro. No. 23-01092, Docket Nos. 117, 118.

8. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: July 19, 2023

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: DStolz@genovaburns.com

DClarke@genovaburns.com

GKinoian@genovaburns.com

*Local Counsel for the Official
Committee of Talc Claimants*